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6 Attorneys for Defendant  
MARC DAVIS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Case No. 1:21-cr-00206-ADA-BAM

**STIPULATION TO EXTEND DEADLINE  
FOR FILING REPLY BRIEF AND TO  
CONTINUE MOTION HEARING; ORDER**

Date: March 13, 2023  
Time: 10:00 a.m.  
Judge: Hon. Ana de Alba

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant  
19 Federal Defender Erin Snider, counsel for Marc Davis, that the Court may extend the deadline  
20 for filing a reply brief from February 20, 2023, to February 23, 2023, and continue the motion  
21 hearing from March 6, 2023, to March 13, 2023, at 10:00 a.m.

Pursuant to the previously established briefing schedule, the defense's reply brief is due February 20, 2023. Defense counsel requires additional time to conduct research and draft her brief. Counsel for the government has no objection to a two-day extension of the deadline to February 22, 2023. To allow the Court sufficient time to review the briefing, the parties also request that the Court continue the motion hearing to March 13, 2023, at 10:00 a.m. The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act,

18 U.S.C. § 3161, et seq. The parties further agree that, for the purpose of computing time under the Speedy Trial Act within which trial must commence, the time period of March 6, 2023, to March 13, 2023, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

## **IT IS SO STIPULATED.**

Respectfully submitted,

**PHILLIP A. TALBERT**  
United States Attorney

Date: February 17, 2023

/s/ Kimberly Sanchez  
**KIMBERLY SANCHEZ**  
Assistant United States Attorney  
Attorney for Plaintiff

**HEATHER E. WILLIAMS**  
**Federal Defender**

Date: February 17, 2023

*/s/ Erin Snider*  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
MARC DAVIS

## ORDER

IT IS SO ORDERED. The defense's reply brief shall be filed on or before February 22, 2023. The motion hearing currently scheduled for March 6, 2023, is hereby continued to March 13, 2023, at 10:00 a.m. For the reasons set forth in the stipulation, the time period of March 6, 2023, to March 13, 2023, inclusive, is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

Dated: February 22, 2023

**UNITED STATES DISTRICT JUDGE**